



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

FJN/JPL

F. #2014R01920/OCDETF#NY-NYE-674

*271 Cadman Plaza East*

*Brooklyn, New York 11201*

September 28, 2022

[REDACTED]

The Honorable Dora L. Irizarry  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: United States v. Yony Alberto Grajales Alvarez  
Criminal Docket No. 14-625 (S-3) (DLI)

Dear Judge Irizarry:

The government respectfully submits this letter under seal in connection with sentencing in the above-referenced case, which is currently scheduled for October 19, 2022 at 11:00 a.m.

[REDACTED]

I. Background

Since at least 2003, the Clan del Golfo Drug Trafficking Organization (“CDG”) (also known as the Urabeños and Clan Usuga) was a Colombian paramilitary and drug-trafficking organization. The CDG shipped or facilitated the shipment of thousands of kilograms of cocaine from Colombia into Mexico and Central America for ultimate importation to the United States. (Presentence Investigation Report, as amended Sept. 23, 2022 (“PSR”) ¶ 37-38). The CDG coordinated the production, purchase and transfer of shipments of cocaine, as well as the receipt of shipments of cocaine in Mexico and Central America. PSR ¶ 38. The CDG financed their paramilitary and drug trafficking by imposing a “tax” on multi-ton shipments of cocaine that transited through areas in Colombia controlled by the organization. *Id.* Specifically, the CDG charged a set fee for every kilogram of cocaine that was manufactured, stored, or transported through areas controlled by the organization. *Id.*

The CDG also employed “sicarios,” or hitmen, who carried out various acts of violence, including murders, assaults, kidnappings and assassinations to collect drug debts, maintain discipline, control and expand drug territory and to promote and enhance the prestige, reputation and position of the organization. Id.

## II. Role of the Defendant

From 2013 until his arrest in December 2016, the defendant Grajales Alvarez was a member of the CDG based in Medellin, Colombia and was primarily responsible for collecting drug debts owed to the CDG. Id. ¶ 41. For example, in 2013, Grajales Alvarez attempted to collect on a debt of approximately \$11 million owed to the CDG in connection with a planned shipment of cocaine from Colombia to the United States, via Honduras. Id. ¶ 44. Later in 2013, Grajales Alvarez attempted to collect another drug debt of approximately \$1 million. Id. Additionally, in 2015, Grajales Alvarez facilitated the distribution of a shipment of cocaine from Colombia to the United States by arranging a meeting between a drug trafficker and the CDG so that the trafficker could use the port of Cartagena, Colombia, which was controlled by the CDG, to dispatch the cocaine shipment. Id.

On February 4, 2016, Grajales Alvarez was arrested in Colombia pursuant to a provisional arrest warrant issued in connection with this case. He was extradited to the United States on August 25, 2017. Id. On February 26, 2019, Grajales Alvarez pled guilty before this Court to Count One of the above-referenced Third Superseding Indictment, charging a violation of 21 U.S.C. § 848. Id. at ¶ 1.

## III. Sentencing Guidelines Calculation and Amendment to the PSR

As set forth in the PSR, the Probation Department has calculated a total offense level of 41. PSR ¶ 58. Grajales Alvarez is a Criminal History Category I, and the Guidelines range is, therefore, 324-405 months’ imprisonment. Id. at ¶ 87. However, as noted in the plea agreement, it is the parties’ understanding that when the United States requests the production of a defendant from Colombia via extradition, the United States agrees that it will not seek a sentence of life imprisonment. Plea Agreement ¶ 1, n.1; PSR ¶ 88.

■ [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]


[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



Respectfully submitted,

BREON PEACE  
United States Attorney

By: /s/ Francisco J. Navarro  
Francisco J. Navarro  
Jonathan P. Lax  
Assistant United States Attorneys  
(718) 254-7000

cc: Sally Butler, Esq. (by email)  
Erica T. Vest, United States Probation Officer (by email)